

November 3, 2021

BY ECF

The Hon. A. David Copperthite
United States District Court for the District of Maryland
101 West Lombard Street, 8B
Baltimore, Maryland 21201

Re: *Alfred Chestnut, et al. v. Donald Kincaid, et al.*
Civil Action No. LKG-20-2342

Dear Judge Copperthite:

Pursuant to your Letter Order of August 9, 2021 (ECF 52), we write regarding a discovery dispute that Plaintiffs and the Baltimore Police Department (“BPD”) have been unable to resolve despite good-faith efforts to do so.

Plaintiffs served a written discovery request on BPD requesting that it produce “true and correct copies of all BPD files regarding investigations of homicides occurring between 1980 and 1983, in which Defendant Donald Kincaid was the lead BPD homicide detective.” BPD has objected to producing such records. The parties met and conferred by telephone on October 19, 2021, but have been unable to resolve their dispute.

Plaintiffs and BPD will set out their respective positions in submissions, to be filed within 24 hours of this letter. Individual Defendant Officers join BPD’s objections and will join BPD’s submission.

Respectfully,

/s/

Kobie A. Flowers (Bar No. 16511)
kflowers@browngold.com
Andrew D. Freeman (Bar No. 03867)
adf@browngold.com
Neel K. Lalchandani (Bar No. 20291)
nlalchandani@browngold.com
Chelsea J. Crawford (Bar No. 19155)
ccrawford@browngold.com
Anthony J. May (Bar No. 20301)
amay@browngold.com
Brown, Goldstein & Levy, LLP
120 E. Baltimore Street, Suite 2500

Baltimore, Maryland 21202

Tel: (410) 962-1030

Fax: (410) 385-0869

/s/

Larry A. Nathans (Bar No. 03023)

nathans@nathanslaw.com

Booth M. Ripke (Bar No. 25764)

bripke@nathanslaw.com

Nathans & Biddle LLP

120 E. Baltimore Street, Suite 1800

Baltimore, Maryland 21202

Tel: (410) 783-0272

Fax: (410) 783-0518

*Attorneys for Plaintiffs Alfred Chestnut,
Andrew Stewart, Jr., and Ransom Watkins*

/s/

Avi T. Kamionski, Bar No. 20703

Shneur Nathan, Bar No. 20707

Mayer Engelsberg Bar No. 21105

Michael J. Elliker, Bar No. 20810

Nathan & Kamionski LLP

575 S. Charles Street Suite 402

Baltimore, MD 21201

T: (312) 612-1928

snathan@nklawllp.com

akamionski@nklawllp.com

mengelsberg@nklawllp.com

melliker@nklawllp.com

Attorneys for Individual Defendants

/s/

Kyle A. Ashe (Bar No. 21551)

Natalie R. Amato (Bar No. 20749)

Justin S. Conroy (Bar No. 28480)

Kara K. Lynch (Bar No. 29351)

Baltimore City Law Department

Office of Legal Affairs

100 N. Holliday Street, Room 101

BROWN, GOLDSTEIN & LEVY, LLP

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Baltimore, Maryland 21202

T: (410) 396-2495/F: (410) 396-2126

natalie.amato@baltimorecity.gov

justin.conroy@baltimorepolice.org

kara.lynch@baltimorepolice.org

kyle.ashe@baltimorepolice.org

Attorneys for Baltimore Police Department